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December 5, 2007

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DEPARTMENT OF
WATER RESOURCES

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Idaho Water Resource Board
Attn: Helen Harrington
322 East Front Street
P.O. Box 83720
Boise, ID 83720-0098

Re: Idaho State Water Plan.

Dear Ms. Harrington:

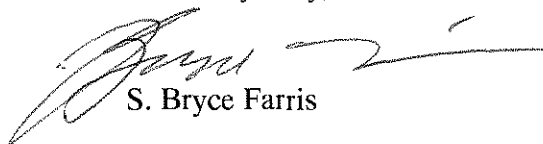
I am writing to you on behalf of our client Nampa and Meridian Irrigation District ("District"). The District recently received a letter dated November 13, 2007, which advised the District that "the Idaho Water Resource Board is in the initial phase of revising the Idaho State Water Plan (SWP)." The letter also provided that "[i]n this initial phase, the Board is looking forward for your input regarding the existing policies and ideas for issues which should be included."

As you know, the District is very interested in additional storage opportunities in the Boise River Basin. The District sent a letter, also dated December 5, 2007, to the Director and the Idaho Water Resource Board informing them of the District's concerns and interest. Additional storage supplies may have broad implications on the Boise River Basin's water supply needs, flood control, possible flow augmentation for salmon, instream flows for the Boise River and may help to reduce the depletion of the basin's aquifer. While the SWP appears to be a broad plan for the management of the State's water resources it does include references to specific basins and basin needs. Accordingly, the District believes that the need for additional storage in the Boise River Basin is something that should be considered in the SWP.

The District would request to be informed and involved in the revisions to the SWP, specifically including those which may deal with the Boise River Basin and additional storage supplies in the Boise River Basin. Please send all further notices to both the District and myself.

Thank you for the opportunity to comment. Please contact me if you have any questions.

Yours very truly,



S. Bryce Farris

cc: NMID
Norm Semanko - Idaho Water Users Association

December 3, 2007

MEDMORANDUM

TO: Barry Burnell, Administrator for Water, IDEQ

FROM: Michael McIntyre, Surface Water Programs Manager

RE: Revisions to IDWR 1996 Idaho State Water Plan

Dave Hovland, Program Manager for Ground Water and I reviewed the Idaho Department of Water Resources 1996 Idaho State Water Plan. Attached is our suggested changes and updates, that would bring said document up to date with our respective programs.

1996 IDWR State Water Plan Review

Potential Areas of Improvement Regarding Ground Water

Section 1J "RECHARGE":

Add reference to authorities and guidance document for DEQ's role in Managed Recharge.

Section 1L "WATER QUALITY":

Also include discussion of ISDA's role in ground water quality monitoring.

Section on "Ground Water" starting on p. 35:

Revise ground water hydrographs and references.

Section on "Water Quality" starting on p.54:

Include new information from DEQ regarding Source Water Assessments/delineations as well as Degraded Nitrate Areas and completed Ground Water Quality Management Plans.

Global Change

Change "Division" of Environmental Quality to "Department" of Environmental Quality

Item for other DEQ Program

Section 3G "Radioactive Waste Monitoring"

Item for Waste Program review.

Surface Water comments on IDWR State Water Plan Review

Throughout document

Replace Division of Environmental Quality with Department of Environmental Quality

Section on Surface-Water Quality p. 54

Replace IDHW DEQ, 1992 report with IDEQ 2002. IDEQ issued a new state water quality report in 2002 as part of national Clean Water Act requirement, formerly called the 305(b) report, now called the Integrate Report . Information on this can be found at http://www.deq.idaho.gov/water/data_reports/surface_water/monitoring/integrated_report.cfm

The sentence on p. 54 starting with In 1994 should be deleted..

Second paragraph should be revised to include discussion on BAGs and WAGs with information at

http://www.deq.idaho.gov/water/data_reports/surface_water/tmdls/overview.cfm#BAGs

IDWR may want to also mention DEQ's TMDL program how it interfaces with BAGs and WAGs as well as DEQ's monitoring program, again all on DEQ's web page at

http://www.deq.idaho.gov/water/data_reports/surface_water/tmdls/overview.cfm#TMDL
and

http://www.deq.idaho.gov/water/data_reports/surface_water/monitoring/overview.cfm

The 5th, 6th and 7th paragraphs should be deleted. IDWR could reference IDEQ 2002 Integrated Report map found at

http://www.deq.idaho.gov/water/data_reports/surface_water/monitoring/integrated_report_2002_map.pdf

January 7, 2008

TO: Idaho Water Resource Board
ATTN: Helen Harrington

FROM: Mary G. McGown, Ph.D.
State Floodplain Coordinator
Idaho Department of Water Resources

RE: Idaho State Water Plan Policies

There are two flood-related topics that I would like to see addressed in state water plan policies. One is about levees and the other is about floodplain management. I'll briefly outline the rationale for both.

Levees

Previous State Water Plans (1982, 1986, 1992, 1996) have policies about the State of Idaho implementing a levee safety program. I believe a policy about levees and the state's role is timely and should be included, along with a specific plan for implementation.

- Levee safety policies and programs are being considered at the federal level that are likely to impact states and local communities with levees. The State of Idaho should be involved in these discussions and help shape the policies and a possible federal levee safety program that would be similar to the dam safety program. There is a national Levee Safety Summit in St. Louis in February and I have recommended that Chuck Galloway, Resource Protection Bureau Chief, attend for this agency.
- We do not know the magnitude of levee problems in Idaho, but we know they exist. In Shoshone County, a digital Flood Information Rate Map (dFIRM) was released by FEMA late in 2007. A levee along Pine Creek in Pinehurst was decertified by the U.S. Army Corps of Engineers, resulting in the area behind the levee being mapped as wet. Pinehurst is a small, economically depressed community that does not have the funds to do the survey and hydrologic and hydraulic analyses required to seek recertification. The results of those studies may confirm that the levee does not provide protection from the 1% occurrence flood (100-year). See the attached June 26, 2007 memo to IDWR managers.

I think this is a harbinger of things to come as more communities get updated flood maps. Anecdotal we know there are a lot of levees in this state. Many were built to protect agricultural lands from frequent flooding, e.g., a two-year event. One edge of the levee is under constant attack by the river. These are not setback levees and they were not designed to protect the type of development that is occurring in floodplains across the state.

- The other levees that snake across Idaho, often far from creeks and rivers, are associated with irrigation canals. The Mora Canal was breached in June 2006 and some residents near Kuna had three feet of water in their homes. The breach apparently was caused by gophers burrowing in the levee. An irrigation levee

along the Truckee Canal in Nevada broke early Jan. 5, 2008 and flooded 300 to 400 homes. About 3,500 people were stranded in the desert agricultural community of Fernley.

- The State of Idaho Hazard Mitigation Plan issued in November 2007 by the Idaho Bureau of Homeland Security, includes a recommendation to, “Develop a statewide levee inventory and levee safety program.” (SHMP-MA07, p. 60)

Floodplain Management

There are two recommendations I would like to see strengthened in the Idaho State Water Plan regarding floodplain management and flooding mitigation.

- Policy 3I – Flood Prone Areas says it is the policy of Idaho “to encourage” the protection of floodplains ...”. I think it is time to implement the recommendation that the National Flood Insurance Program (NFIP) be adopted statewide. The NFIP includes minimum regulations and standards for floodplain development. A community has the option to adopt higher standards.

The only Idaho statutes relating to flooding are I.C. 46-1020 - 1025, in the Militia and Military Affairs chapter. Throughout, the statute language is permissive and “encourages” communities to implement flood mitigation, and uses the term “may,” as in 46-1022, Local governments may adopt floodplain zoning ordinances.

It is time for the state to take a more proactive role in flood mitigation and to require that all development meet the minimum NFIP standards. Growth in Idaho in some cases is outstripping small communities’ ability to regulate, especially where there is no building code. Frequently my office gets calls from local governments asking if there is a state statute that will help them regulate what is happening in their floodplains. This would not be an instance of imposing unwanted regulation on cities and counties, it would be a step toward protecting lives and property.

- The inadequacy of flood maps contributes to the difficulty of communities in regulating development in floodplains. There is not a documented inventory of FIRMS in Idaho, but anecdotally I have observed that most maps are from the 1980s. Most do not have detailed studies. That means that the hydrology and hydraulics studies have not been done to determine Base Flood Elevations (BFE). Some counties in Idaho have never been mapped. This means that most NFIP communities are trying to manage with old information, for approximate A zones, or without any specific information. I have attached two maps to help you understand the importance of mapping to Idaho communities. One map shows the counties and cities that are members of the NFIP. The other shows the status of flood mapping in our state.

In 2003 Congress appropriated \$1 billion for FEMA to update the nation’s flood maps in a program called Map Modernization, Map Mod for short. Midway through the project, it became apparent that five years and \$1 billion were not sufficient to restudy and remap flood hazards across the entire country. A mid-course adjustment resulted in communities being targeted that met metrics of population and level of development, among others. That means that in Region X

(Oregon, Washington, Alaska and Idaho), most mapping resources went to western Washington and Oregon, where there is the greatest population. MapMod will expire at the end of federal fiscal year 2008. There is no federal mapping program slated to continue.

Idaho communities desperately want and need better flood hazard information to help them develop in the safest and most economic ways. Across the nation, states have contributed funding or technical resources to flood hazard mapping. Some states, including Washington, will have digital flood maps for every county.

I suggest a policy in the state water plan that speaks to the need for the State of Idaho to take the lead in mapping or to support communities in obtaining up-to-date flood hazard maps either through funding or technical assistance.

The State Hazard Mitigation plan includes a recommendation to, "Improve floodplain mapping in Idaho through a partnership with FEMA, IDWR, the State of Idaho Chief Information Officer, and local governments." (SHMP-MA03, p. 59)

June 26, 2007

TO: Dave Tuthill, Hal Anderson, Gary Spackman, Chuck Galloway, Brian Patton, Rick Raymondi

FROM: Mary McGown

RE: Levees in Idaho

On June 21, 2007 there was a meeting in Pinehurst to discuss the status of the levees in Shoshone County. The Flood Insurance Rate Map (FIRM) is being updated for Shoshone County. The D-FIRM was about to be released in 2006, when FEMA ruled that many of the levees in the county are substandard and will not provide protection from the 1% occurrence flood. Consequently, the area behind the levees has been mapped as "wet," and it will be recommended, and in some cases required, that residents buy flood insurance.

The meeting was called by the Shoshone County Floodplain Administrator and focused on the levees along Pine Creek through Pinehurst. FEMA and the US Army Corps of Engineers were invited to discuss levee requirements for certification. The meeting was attended by at least a dozen citizens and elected officials.

The first question the City of Pinehurst must research is what level of protection is provided by the levees. In addition to survey data, the hydrology and hydraulics of Pine Creek need to be understood. The question was raised whether the state could provide technical assistance.

I envision that now or at some time in the future there will be calls to IDWR looking for technical assistance and/or funding to address levee issues. There may be funding sources available to the Silver Valley, due to the Superfund projects, that are not available to other communities. I am giving you a heads up that requests for assistance may come from this community or others as more of the state is mapped and levees are found to be substandard.

We do not know how many levees there are in Idaho. Nationwide, it is estimated that one out of four counties has levees. There are not a lot of counties currently being remapped in Idaho.

Federal Emergency Management Agency Community Status Report

Communities Participating in the National Flood Insurance Program

- Cities
- ▨ Counties
- Cities Not in Program With Hazard Areas Identified
- ▨ Counties Not in Program

Scale 1:3,199,157

0 20 40 60 80 Miles

